

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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MARY LAROCHELLE, SANDRA RIKER, EMILIA SHEARER, CANDICE GALBREATH and NICOLE VASQUEZ	:	
	:	
Plaintiffs,	:	Civil Action No. 12-5567
v.	:	
	:	
	:	Judge Lawrence Stengel
WILMAC CORPORATION, WILMAC HEALTH CARE, INC., MCWIL GROUP LIMITED and LANCASHIRE HALL	:	
	:	
Defendants.	:	
	:	

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**DEFENDANTS' MOTION FOR LEAVE TO FILE REPLIES  
TO PLAINTIFFS' RESPONSES TO SUMMARY JUDGMENT  
FILED BY DEFENDANTS**

Defendants Wilmac Corporation, Wilmac Health Care, Inc., McWil Group Limited and Lancashire Hall, by and through their undersigned counsel, Burns White LLC, respectfully submit this motion for leave to file respective reply memoranda to Plaintiff's Response in Opposition to Summary Judgment.<sup>1</sup> In support of their Motion, Defendants aver as follows:

1. On July 31, 2015, Defendants filed four summary judgments motions seeking to dismiss the Third Amended Complaint.
2. Plaintiff requested an extension to file responses to the Vasquez and Shearer Motions to September 4, 2015 and responses to the LaRochelle and Riker Motions to September 16, 2015.

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<sup>1</sup> Although Defendants filed separate Motions for Summary Judgment, Defendants file one request for leave to file replies to save the parties and the Court time in reviewing and responding to four separate motions for leave.

3. Defendants did not receive full unredacted copies of Plaintiffs' responses to Vasquez and Shearer until September 10<sup>th</sup> at 4:30 p.m.

4. The Vasquez and Shearer responses contained detailed verifications from the Plaintiffs and previously unseen affidavits from potential fact witnesses in support of their oppositions.

5. Defendants anticipate that the LaRochelle and Riker oppositions will also contain detailed verifications which will take time for counsel to review and appropriately respond.

6. As a result, Defendants respectfully seek leave to file respective reply memoranda to address these "new" allegations brought to light by Plaintiffs in their oppositions.

7. Specifically, Defendants seek to file replies to the oppositions to the Vasquez and Shearer motions by September 24, 2015 and replies to the Riker and LaRochelle oppositions by October 8, 2015.

8. Counsel for Defendants have corresponded with Counsel for Plaintiffs and she has no objections to the filing of responses or the time requested to file the responses.

WHEREFORE, Defendants respectfully request that this Court grant the relief requested in the proposed Order accompanying the Motion granting Defendants' leave to file respective

reply memoranda to Plaintiffs' Responses to the Shearer and Vasquez oppositions by September 24, 2015 and to the Riker and LaRochelle oppositions by October 8, 2015.

Respectfully Submitted,

**Burns White LLC**

/s/ *Angela A. Cronk*

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Date: September 16, 2015